

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MICHAEL COOPER,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO.: 3:22-cv-19
	)	
MATTHEW URBAN and	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendants.	)	

Serve Defendant by Registered Mail at:  
US ATTORNEY FOR THE SOUTHERN DIST. OF IL.  
9 EXECUTIVE DRIVE  
FAIRVIEW HEIGHTS, IL 62208

**COMPLAINT**

COMES NOW Plaintiff, Michael Cooper, by and through his attorney Matthew P. Young of the law firm of Kuehn, Beasley & Young P.C., and for his Complaint against Defendants, Matthew Urban and United States of America, states as follows:

**COUNT I – NEGLIGENCE AGAINST MATTHEW URBAN**

1. Plaintiff is and was at all relevant times a resident of Madison County, Illinois.
2. Upon information and belief, Defendant was a member of the United States Air Force at the time of the accident.
3. Upon information and belief, Defendant was employed by United States of America on or about February 17, 2020, and driving a vehicle from one Air Force Base to

another UNITED STATES OF AMERICA Air Force Base under orders from the United States of America and with its permission.

4. On or about February 17, 2020, Plaintiff was in a vehicle traveling on Interstate 270, in Madison County, when the vehicle Plaintiff was in was struck by the vehicle Defendant Urban was driving. At the time of the collision, Defendant Urban was an employee of Defendant UNITED STATES OF AMERICA and operating a motor vehicle in the scope and course of his employment with Defendant.

5. At all relevant times, Defendant had a duty to exercise reasonable care to avoid colliding with other vehicles.

6. That at the above-mentioned time and place, Defendant was negligent in one or more of the following ways:

- a. Carelessly and negligently fell asleep at the wheel;
- b. Carelessly and negligently failed to keep his vehicle in his lane of travel;
- c. Carelessly and negligently lost control of his vehicle;
- d. Failed to be attentive;
- e. Failed to obey the rules of the road; or
- f. Failed to exercise reasonable care in operating the motor vehicle.

7. That as a direct and proximate result of one or more of these negligent acts, Plaintiff was injured.

8. That Plaintiff has suffered, and will suffer in the future, severe injury and pain, lost wages, loss of enjoyment of life, medical bills past and future, past and future pain and suffering and disability and property damage as a result of Defendant's negligence.

WHEREFORE, Plaintiff prays for judgment against Defendant, Matthew Urban, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs and for such further relief as this Court deems just and proper.

**COUNT II – NEGLIGENCE – UNITED STATES OF AMERICA**

1. Plaintiff is and was at all relevant times a resident of Madison County, Illinois.

2. Upon information and belief, Defendant Matthew Urban was employed by UNITED STATES OF AMERICA on or about February 17, 2020 and driving a vehicle from one Air Force Base to another UNITED STATES OF AMERICA Air Force Base under orders from the United States of America and with its permission.

3. On or about February 17, 2020, Plaintiff was in a vehicle traveling on Interstate 270, in Madison County, when the vehicle Plaintiff was in was struck by the vehicle Defendant Urban was driving. At the time of the collision, Defendant Urban was an employee of Defendant UNITED STATES OF AMERICA and operating a motor vehicle in the scope and course of his employment with Defendant.

4. At all relevant times, Defendant had a duty, by and through its agents and employees, to exercise reasonable care to avoid injuring Plaintiff.

5. That at the above-mentioned time and place, Defendant, by and through its agent and employee, was negligent in one or more of the following ways:

- a. Carelessly and negligently fell asleep at the wheel;
- b. Carelessly and negligently failed to keep his vehicle in his lane of travel;
- c. Carelessly and negligently lost control of his vehicle;
- d. Failed to be attentive;
- e. Failed to obey the rules of the road; or
- f. Failed to exercise reasonable care in operating the motor vehicle.

6. That as a direct and proximate result of one or more of these negligent acts, Plaintiff was injured.

7. That Plaintiff has suffered, and will suffer in the future, severe injury and pain, lost wages, loss of enjoyment of life, medical bills past and future, past and future pain and suffering and disability and property damage as a result of Defendant's negligence.

WHEREFORE, Plaintiff prays for judgment against Defendant, UNITED STATES OF AMERICA, in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs and for such further relief as this Court deems just and proper.

Respectfully Submitted,

/s/ Matthew P. Young

Matthew P. Young #60370

Attorney for Plaintiff

Kuehn, Beasley & Young, P.C.

23 South 1<sup>st</sup> Street

Belleville, IL 62220

Phone: 618.277.7260

Fax: 618.277.7718

[tracyd@kuehnlawfirm.com](mailto:tracyd@kuehnlawfirm.com)

[mattyoung@kuehnlawfirm.com](mailto:mattyoung@kuehnlawfirm.com)